

SNR DENTON US LLP  
D. Farrington Yates, Esq. (DY 8383)  
1221 Avenue of the Americas  
New York, New York 10020  
Tel: (212) 768-6700  
Fax: (212) 768-6800

*Attorneys for Dr. Michael C. Frege, in his capacity  
as Insolvency Administrator of Lehman Brothers  
Bankhaus AG (in Insolvenz)*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC,  
*et al.*,

Debtors.

Chapter 11

Case No. 08-13555 (JMP)

**NOTICE OF MOTION BY INSOLVENCY ADMINISTRATOR  
AND FOREIGN REPRESENTATIVE OF LEHMAN BROTHERS  
BANKHAUS AG (*i. Ins.*) FOR AN ORDER APPROVING AGREEMENTS  
WITH LEHMAN BROTHERS HOLDINGS INC. AND AUTHORIZING  
THE SALE OF CERTAIN NOTES FREE AND CLEAR OF  
ALL LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS**

PLEASE TAKE NOTICE that a hearing on the Motion by Insolvency Administrator and Foreign Representative of Lehman Brothers Bankhaus AG (*in Insolvenz*) for an Order Approving Agreements with Lehman Brothers Holdings Inc. and Authorizing the Sale of Certain Notes Free and Clear of All Liens, Claims, Encumbrances and Interests filed by Dr. Michael C. Frege, in his capacity as duly authorized Insolvency Administrator and foreign representative of Lehman Brothers Bankhaus AG (*in Insolvenz*) ("LBB") filed in the proceeding captioned *In re Lehman Brothers Bankhaus AG (in Insolvenz)*, Case No. 09-12704, (Bankr. S.D.N.Y.) (Chapter 15) will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling

Green, New York, New York 10004 (the “Bankruptcy Court”), on **March 23, 2011 at 10:00 a.m. (ET)** (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that the Motion seeks approval and authorization for Dr. Michael C. Frege (the “LBB InsAdmin”) in his capacity as duly authorized Insolvency Administrator and foreign representative of LBB, for the sale and assignment of LBB’s right, title and interest in the SASCO Notes, Spruce Notes and Verano Notes (as defined in the Motion) to the debtor in the above captioned proceeding, Lehman Brothers Holdings Inc. (“LBHI”), free and clear of liens, claims, encumbrances and interests.

PLEASE TAKE FURTHER NOTICE that copies of the Motion are available to parties-in-interest on the Bankruptcy Court’s Electronic Case Filing System, on the docket for the proceeding captioned *In re Lehman Brothers Bankhaus AG (in Insolvenz)*, Case No. 09-12704, (Bankr. S.D.N.Y.) (Chapter 15), at docket number 36, which can be accessed from the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document) or upon written request to Dr. Frege’s U.S. counsel (including by facsimile or e-mail) addressed to:

SNR DENTON US LLP  
1221 Avenue of the Americas  
New York, New York 10020  
Tel: (212) 768-6700  
Fax: (212) 768-6800  
Attn: D. Farrington Yates, Esq.  
[farrington.yates@SNRDenton.com](mailto:farrington.yates@SNRDenton.com)

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure (the “Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed

with the Bankruptcy Court electronically on the docket for the proceeding captioned *In re Lehman Brothers Bankhaus AG (in Insolvenz)*, Case No. 09-12704, (Bankr. S.D.N.Y.) (Chapter 15), in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Word, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601, (ii) SNR Denton US LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: D. Farrington Yates, Esq., attorneys for the Insolvency Administrator for LBB, (iii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Richard P. Krasnow, Esq. and Maurice Horwitz, Esq., attorneys for Lehman Brothers Holdings Inc., (iv) the Office of the United States Trustee for Region 2 (the "U.S. Trustee"), 33 Whitehall Street, 21st Floor, New York, New York 10004 Attn: Elisabetta G. Gasparini, Esq., Andrea B. Schwartz, Esq., and Tracy Hope Davis, Esq., (v) the attorneys for the Official Committee of Unsecured Creditors in the Lehman Parties' bankruptcy proceedings; (iii) the Securities and Exchange Commission; (vi) the Internal Revenue Service; (vii) the United States Attorney for the Southern District of New York, and (viii) any person or entity with a particularized interest in the Motion, so as to be so filed and received by no later than **March 16, 2011 at 4:00 p.m. (ET)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the  
Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: March 2, 2011  
New York, New York

SNR DENTON US LLP

By: /s/ D. Farrington Yates  
D. Farrington Yates (DY 8383)  
1221 Avenue of the Americas  
New York, New York 10020  
Tel: (212) 768-6700  
Fax: (212) 768-6800

*Attorneys for Dr. Michael C. Frege, in his capacity  
as Insolvency Administrator of Lehman Brothers  
Bankhaus AG (in Insolvenz)*